



Page 5

1 T-A-B-L-E O-F C-O-N-T-E-N-T-S  
2 Exhibits: Page  
3 No. 118 Memo from Billy Mangold dated  
4 December 8, 2004, with the  
5 subject of Emergency Shelter  
6 Extensions, bearing Bates  
7 Number 47330.....184  
8 No. 119 Excerpt from the policy manual  
9 Bates stamped DHS 403 through  
10 DHS 450.....238  
11 No. 120 Excerpts from the policy manual  
12 bearing Bates DHS 451  
13 through 472.....264  
14 No. 121 Excerpts from the DHS policy  
15 manual bearing Bates DHS 611  
16 through 613.....266  
17  
18 Certificate of Reporter.....293  
19 Witness Signature Page.....294  
20  
21  
22  
23  
24  
25

Page 226

1 production.  
 2 MS. MALLET:  
 3 Send us a request.  
 4 MS. CREAN:  
 5 Q. Please turn to page DHS 476 of  
 6 Exhibit 70. Do you see here where it says that  
 7 policy requires that all foster children between  
 8 0 and 2 years of age shall be referred to the  
 9 First Steps Early Intervention Program for  
 10 assessment and follow-up services as needed?  
 11 A. Yes.  
 12 Q. Who in DHS is responsible for making  
 13 sure infants and toddlers in foster care receive  
 14 their early intervention checkup?  
 15 A. That would be done by the social  
 16 worker and the supervisor.  
 17 Q. Do you share a responsibility for  
 18 that?  
 19 A. Yes.  
 20 Q. Do you review aggregate data on that?  
 21 A. No. I have not seen any data on  
 22 that.  
 23 Q. Do you do anything to insure that  
 24 infants and toddlers in DHS care receive their  
 25 early intervention services?

Page 227

1 A. No. I have not done anything with  
 2 that.  
 3 Q. Who is responsible for making sure  
 4 that children get their ongoing medical, dental,  
 5 and mental health services as set forth in  
 6 Exhibit 70?  
 7 A. The social worker and ASWS and then  
 8 on up to the Regional Director.  
 9 Q. If you would turn to page DHS 474.  
 10 It sets forth a schedule for physical  
 11 examinations. Who is responsible for making  
 12 sure that children get their exams according to  
 13 the specific timetable set forth in DHS policy?  
 14 A. The social workers.  
 15 Q. What if anything do you do to make  
 16 sure that foster children receive their checkups  
 17 in accordance with the period schedule set forth  
 18 in DHS 474?  
 19 A. I don't do anything specifically.  
 20 Q. Turn to page DHS 477. What if  
 21 anything do you do to insure that children  
 22 receive their immunizations in accordance with  
 23 the schedules set forth at page DHS 477?  
 24 A. I don't do anything specifically.  
 25 Generally what happens here is our foster

Page 228

1 parents -- we have these children either placed  
 2 with relatives or foster parents. They insure  
 3 that the immunizations are done and then that  
 4 documentation is provided to us.  
 5 Q. But for children in custody, it is  
 6 DHS's responsibility to secure children's access  
 7 to medical services; is that correct?  
 8 A. But the foster parents are an  
 9 umbrella of MDHS.  
 10 Q. So it's your testimony that it's the  
 11 foster parents' responsibility to insure that  
 12 children comply with their immunization  
 13 schedule?  
 14 A. I'm not saying that it's -- the total  
 15 responsibility lies with the foster parents, but  
 16 as I say, we do utilize the foster parents to  
 17 keep up with the immunization records for  
 18 children. And that information is then provided  
 19 to our social workers.  
 20 Q. And are your social workers  
 21 responsible for insuring that children comply  
 22 with their immunization schedules?  
 23 A. Yes.  
 24 Q. If you could turn back to Exhibit 40.  
 25 DHS 474, the middle of the page.

Page 229

1 A. Which number did you say?  
 2 Q. Oh, 432. It says here that the ISP  
 3 is supposed to specify the plan for assuring  
 4 that the child receives proper care and  
 5 services. Is it your understanding --  
 6 A. Where does it say that?  
 7 Q. Middle of the page.  
 8 MS. MALLET:  
 9 Which paragraph are you talking  
 10 about?  
 11 A. Right here.  
 12 MS. MALLET:  
 13 Okay. Are you talking about the plan  
 14 for assuring the child receives proper care and  
 15 services?  
 16 MS. CREAN:  
 17 Q. That's correct. Does services here  
 18 mean that the ISP is supposed to identify  
 19 services to meet the child's physical health  
 20 needs?  
 21 A. Yes. And also services that we  
 22 provide to the parents as well to help with the  
 23 return of the child to the home.  
 24 Q. Turn to Exhibit 117, 38561.  
 25 A. Hold on. What was the number?

58 (Pages 226 to 229)